

**Solutia Inc.**  
W.G. Krummrich Plant  
500 Monsanto Avenue  
Sauget, Illinois 62206-1198  
Tel 618-271-5835

November 6, 2002


Mr. Michael Ribordy  
U. S. EPA - Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)  
November 2002 Monthly Report**

Dear Mr. Ribordy,

Enclosed is the November 2002 **Monthly Report** for Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by **Consent** for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

  
fr. Alan G. Faust  
Project Coordinator  
Solutia Inc.

cc:

K. Turner - USEPA  
T. Gouger - USACE  
S. Bron - IEPA  
Sauget File - Solutia  
Village of Sauget - c/o P. H. Weis & Associates (Attn: Brian Nelson)  
Kevin de la Bruere - USF&W  
Michael L. Henry - IDNR  
Dave Webb - IDPH  
Mayor Dee Reed - Cahokia, IL  
Mayor P. Sauget - Sauget, IL  
Linda Tape - Husch & Eppenberger

EPA Region 5 Records Ctr.



226609

## **Sauget Sites Area I - Sauget, Illinois**

### **AOC - EECA / RIFS**

#### **Monthly Report**

**Date of Report:** November 6, 2002  
**Period Covered:** October 1, 2002 - October 31, 2002  
**Next Report Period:** November 1, 2002 - November 30, 2002

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#### **Work Performed during the reporting period**

##### **Background**

The Sauget Area I consolidated draft EE/CA & RI/FS Report was submitted to the Agencies for review and comment on **March 9, 2001**. Revision 01 Draft EE/CA & RI/FS Report was submitted to the Agencies on **June 8, 2001**. The Agencies responded to Revision 01 Draft EE/CA & RI/FS Report on **July 17, 2001**, requiring additional revisions before approval. Agreement was reached in an **August 3, 2001** meeting that the Agencies would further modify and revise the **Revision 01 Draft EE/CA & RI/FS Report** and return it to Solutia for completion and **final issuance**. During **October 2001**, the Draft EE/CA & RI/FS Report was revised by the Agencies. Solutia has commented to the Agencies on the **recommended modifications**.

Revision 2 of the Draft HHRA - submitted to the Agencies **August 31, 2001** - was approved by the Agencies in a **November 13, 2001** letter.

##### **October Results**

The **October 2001 Draft EE/CA & RI/FS Report** - along with Solutia's comments on the Agencies' proposed revisions - **remained under review** by the Agencies.

A revised Draft Ecological Risk Assessment ("ERA") submitted to the Agencies **June 29, 2001** remained under review.

Draft comments were received from **USEPA** on the Sauget Area I Dead Creek Final Remedy EE/CA, which was submitted to the Agencies on **June 21, 2002**. These draft comments are being reviewed prior to **issuance** of the final comments by USEPA.

There are no Technical Memos attached to this report.

### **Data Submittal**

There are no data submitted in this report.

### **Work scheduled for next reporting period**

Assist Agencies as requested in completion and issuance of the Final EE/CA & RI/FS Report and ERA.

### **Problems and Solutions**

None

### **Submittal Schedule Status**

See attached schedule - consistent with the approved SSP - as revised where indicated.

### **Other Issues**

None

### **Comments**

None

**January 21, 1999 Sauget Area I AOC**  
**SCHEDULE**

**(03/01 Revision)**

- |  |   |
|--|---|
| 1. Designation of Contractor                         | Completed 3/10/99 <sup>1</sup>  |
| 2. Designation of Other Contractors                  | 5 Business Days Before Start of Work  |
| 3. Designation of Project Coordinator                | Completed   |
| 4. Submit Support Sampling Plan (SSP)                | <b>Submitted February 22, 1999</b>  |
| 5. Submit Revised SSP                                | April 8, 1999 <sup>2</sup><br>June 25, 1999 <sup>3</sup><br>August 13, 1999 <sup>4</sup><br><b>October 9, 1999<sup>5</sup> Approval</b> |
| 6. Obtain Access Agreements                          | July 1, 1999 <sup>6</sup><br>October 17, 1999 <sup>7</sup><br>October 1, 1999 <sup>8</sup>  |
| 7. Submit Health and Safety Plan (HASP)              | Approved October 9, 1999  |
| 8. Submit Quality Assurance and Sampling Plan (QAPP) | Approved October 9, 1999  |

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<sup>1</sup> Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications".

<sup>2</sup> Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of U. S. EPA comments from the February 22, 1999 SSP submittal". U. S. EPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to U. S. EPA April 8, 1999 and disapproved June 3, 1999.

<sup>3</sup> April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25<sup>th</sup> as required.

<sup>4</sup> June 25<sup>th</sup> SSP submittal disapproved July 16, 1999 and resubmitted August 13, 1999.

<sup>5</sup> August 13, 1999 SSP submittal as revised August 30, 1999 and October 7, 1999 received final Agency approval on October 9, 1999.

<sup>6</sup> Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

<sup>7</sup> Access agreements update issued August 15, 1999 with request to extend deadline to October 17, 1999. Extensions to October 17, 1999 were granted by Mike McAteer in an August 17, 1999 e-mail to Mike Light.

<sup>8</sup> Access agreements update issued October 17, 1999 with request to extend deadline to October 1, 1999. Extensions to October 1, 1999 was granted by Mike McAteer in a October 21, 1999 e-mail to Mike Light

**January 21, 1999 Sauget Area I AOC**  
**SCHEDULE (Cont.)**

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|--|--|
| 9. Sampling Notification   | 10 Business Days Prior to Start of Work <sup>9</sup>   |
| 10. Submit Data Report <sup>10</sup>   | 01/09/01 <sup>11</sup> <i>(Submitted 1/9/01-)<br/>Included HH &amp; Eco R/As)</i>  |
| 11. Submit EE/CA Report <sup>12</sup>  | 60 Calendar Days After Data Report Submittal - 03/09/01  |
| <ul style="list-style-type: none"><li>• Revised HHR/As</li><li>• Revised ECO R/A</li></ul> | <b>Approved November 13, 2001</b><br>June 29, 2001 Draft under review.   |
| 12. Submit Revised EE/CA Report  | 21 Calendar Days After Receipt of EPA Comments<br>Revised Report Submittal – 06-08-01<br><b>(Submitted 6/8/01)</b>   |
| 13. Submit RI/FS Report  | 90 Calendar Days After Data Report Submittal - 04/09/01<br><b>(Submitted 3/9/01 w/ EECA Report)</b>  |
| 14. Submit Revised EE/CA & RI/FS Report  | 21 Calendar Days After Receipt of EPA Comments <b>(Submitted March 30, 2001)</b><br>Revised Report Submittal – 06-08-01<br><b>(Submitted 6/8/01)</b><br>Revised Report Submittal – 08-10-01<br><b>(Agreement reached in 08-03-01 meeting – Agency to prepare next draft prior to Solutia's completion)</b> |

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<sup>9</sup> Notification given on August 19, 1999 that Air Sampling will begin on October 7, 1999. Per 9-2-99 phone conversation with Mike McAteer, the 10 day notification requirement can be treated as a "Day 1" requirement only, which has already been met.

<sup>10</sup> The January 9, 2001 Data Report submittal also included the draft Human Health and ECO Risk Assessments.

<sup>11</sup> Per SSP - 16 mo. from SSP approval date of 9/9/99.

<sup>12</sup> The March 9 EECA submittal also included the RIFS.

**January 21, 1999 Sauget Area I AOC**  
**SCHEDULE (Cont.)**

15. Progress Reports

Monthly Beginning February 19,  
1999<sup>13</sup>

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<sup>13</sup> Pursuant to decisions in 9-1-99 EPA Kickoff Meeting - Report period for the monthly report will be changed to the calendar month to coincide with project field work - due on the 10<sup>th</sup> of the month.